

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V., NORDVPN
S.A., NORD SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

**DECLARATION OF SAMUEL SAHAGIAN IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Samuel Sahagian declares as follows:

1. I am an attorney at Fenwick & West. I am competent to testify and make this declaration based on my personal knowledge and records I have reviewed.
2. Attached as Exhibit 1 is a printout of the webpage depicting the General Terms of Service for NordVPN, NordPass, and NordLocker, as it appeared on August 2, 2023. This printout was obtained from archive.today, available at <https://archive.fo/8nx4S> (last visited June 28, 2024).
3. Attached as Exhibit 2 is a printout of the webpage depicting the Subscription Terms for NordVPN, NordPass, and NordLocker, as it appeared on August 2, 2023. This printout was obtained from archive.today, available at <https://archive.fo/nSxlg> (last visited June 28, 2024).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 3rd day of July, 2024.

By: /s/ Samuel Sahagian